

Comments prior to April 10, 2006

Comment:

Broker (s) shall not lease or charge a monthly fee to newly licensed loan originator for the first two years.

I personally have learned of this creative business operation thru Real Estate Service Brokers, and I hope DFI can adapt a rule that will discourage this type of business arrangement with newly licensed loan originator (s).

Comment:

We would like to request consideration for a reciprocal agreement between Washington and Oregon, since Oregon law already requires Loan Officer licensing and continuing education to one of the highest standards in the industry.

Comments:

If a loan originator has 20 years of experience, he suggests a credit in lieu of taking a class for licensing purposes.

He suggests some type or kind of exemptions for us "old timers" who have been originators for 20 years or more with no problems or lawsuits, etc.

Comment:

I would like to recommend that WA not follow suit like the Designated Broker requirements and force loan officers to have to travel to WA to take the test. There are alot of creditable education and testing facilities throughout the country that can administer proctor exams. I would highly recommend Promissor. I would also hope that this new law would require these agents to have continuing education as well.

I would also like to suggest that WA revisit the Bond requirements for the Brokers and Lenders. As a licensed Mortgage Broker in your state I have to carry a \$60,000 bond for all my LO's and offices. This in my opinion can and should be reduced and or eliminated with the requirements of agent licensing and the consequence of an agent having their license revoked for perpetrating illegal activities and the fines you should be able to impose against the agents for violations of statutory laws.

I also hope that this same new law will also be effective towards the banker's loan officers. These individuals act in the same capacity and conduct the same business as loan brokers.

Comment:

I would like to see new rules in place that require all mortgage lenders to be required to fully disclose the following information in all advertisements, including internet ads:

- Loan Officer or Broker's full name
- Company name (not an unregistered DBA or URL)
- LO's direct telephone number
- Broker's office telephone number
- Broker's office address
- Valid WA Mortgage Broker's license number

This requirement should be similar to the one that Real Estate agents must comply with.

Ads should also include any & all required lending disclosure notices as well.

In addition, Real Estate Agents & Brokers should no longer be allowed to originate loans with out a Mortgage Broker or Loan Officer/Originator license as mortgage lenders can not perform any duties of a Real Estate Agent/Broker with out said license.

Comment:

Regarding independent status. Truly independent contractor status respects the professionalism and business privacy of the individual. As a consultant one does not divulge their client base one to the other, and the government should not do that without the individual's permission. The broker's get all of the cash flow and other business capitalization benefits by using independent consultants/contractors. Each broker does not have a full suite of capabilities i.e. small apartment buildings, commercial real estate etc. Loan originators may work in one or several of these domains which is to their credit. It is fair to pay the fee for each broker that one may originate loans for. But I believe that is privy information. If the broker wants to take that person on as a captive employee, then they should pay the price of benefits packages, profit sharing etal.

Regarding license fees --- A sliding scale akin to the fees we pay for registering new cars versus old cars. New loan officers should pay more to buy in. With education and knowledge base testing and a non trivial fee, only the serious minded will step up to the plate, which is as it should be. To be an engineer of professional status for the state, one has to spend a great deal of money and study to get there. Just like a new car license fee is high at the first year. After three years it is pretty much at a maintenance level which is not a bad model, and it would generate a

lot more funds for Laura's model. This could be a great source of revenue and be made to be quite fair to the established workers in the field. Thanks for a good show.

Comments:

In order to make loan originators fees equitable, you could charge to get a license, and then charge a lesser fee to get additional certificates to work for other companies.

Supervisory authority – Distinguish between exercised authority or authority retained by definition such as an owner always has authority. What if they choose to delegate it? Are they still responsible?

Comment:

Loan originators should not be allowed to work for more than one mortgage broker.

Comment:

We need to address the issue of applying for a new job and not wanting the old broker to have that information vs. working for multiple brokers.

Comment:

He suggests a summary of rights of the borrower be placed in the rules

Comment:

I would like to see it more difficult, maybe more costly, for loan originators to hang their license at more than one location.

Comments:

The roving loan originator needs to come at a premium. The point of licensing is to tighten things up and stop some of the issues we're having now.

The designated broker should be held to a much higher standard on the testing.

Comment:

He encourages us to only have people take tests within the Washington borders not use a third party to administer the test.

Comments:

New loan originators without years of experience should have to pay higher fees. Maybe there could be some type of a tiered level for fees based on experience.
